

**JUDICIAL MERIT SELECTION COMMISSION
PERSONAL DATA QUESTIONNAIRE**

Court, Position, and Seat # for which you are applying:
Family Court, At-Large, Seat 2

1. NAME: Mr. Sean F. Keefer
BUSINESS ADDRESS: 1643B Savannah Highway – Suite 226
Charleston, SC 29407
TELEPHONE NUMBER: (office): 843-364-3341
2. Date and Place of Birth: 1966, Gastonia, NC
3. Are you a citizen of SC? Yes.
Have you been a resident of this state for at least the immediate past five years? Yes.
5. Family Status: Married on August 10, 1997, to Wendy R.J. Keefer. Never divorced, no children.
6. Have you served in the military? No.
7. List each college and law school you attended, including the dates of your attendance, the degrees you received, and if you left an institution without receiving a degree, the reason for your departure.
 - (a) USC – 1984-88 – BA, Journalism;
 - (b) USC – 1989-91 – MA, Mass Communication;
 - (c) Norman Adrian Wiggins School of Law;
Campbell University – 1994-97 – JD.
8. List the states in which you have been admitted to practice law and the year of each admission. Also list any states in which you took the bar exam but were never admitted to the practice of law. If you took the bar exam more than once in any of the states listed, please indicate the number of times you took the exam in each state.

Admitted to practice in SC Fall 1997. No other bar exams taken.
9. List the significant activities in which you took part during your attendance at college, graduate, and law school. Give the dates you were involved in these activities and list any leadership positions you held.

Undergraduate

 - (a) Various roles, including editor positions, in student media – 1985-88;
 - (b) Campus Judicial Board – 1986-91;
 - (c) Phi Delta Fraternity Member – 1987-91.

Graduate School

 - (a) Phi Delta Theta Graduate Assistant – 1989-91;
 - (b) Graduate Internship SC Aeronautics Commission – 1990-91.

Law School

 - (a) Student Honor Council – 1995-96;
 - (b) Student Honor Council Attorney General – 1996-97.



10. Describe your continuing legal or judicial education during the past five years. Include only the title and date of any continuing legal or judicial education course completed.

<u>Conference/CLE Name</u>	<u>Dates</u>
----------------------------	--------------

2012-2013

(a) Using Early Neutral Evaluation in Family Court	6/22/2102;
----------------------------------------------------	------------

2011-2012

(b) SC Bar Convention DR Section Counsel Presenter	1/19/2012;
----------------------------------------------------	------------

(c) Taking the Children Out of the Fire (Presented/Attended omitted inclusion on CLE report)	6/17/2011;
----------------------------------------------------------------------------------------------	------------

(d) Guardian ad Litem Program Workshop	6/2/2011;
----------------------------------------	-----------

2010-2011

(e) SC Bar Convention DR Section Counsel Presenter	1/20/2011;
----------------------------------------------------	------------

(f) Family Mediation Training (Assistant Instructor)	1/3-1/7-2011;
------------------------------------------------------	---------------

(g) Mini Summit on Justice for Children	12/2/2010;
-----------------------------------------	------------

(h) SCDTAA Joint Meeting	7/22/2010;
--------------------------	------------

(i) Representing the Volunteer	5/7/2010;
--------------------------------	-----------

2009-2010

(j) Family Court Bench Bar	12/3/2009;
----------------------------	------------

(k) Till Debt Do Us Part	11/4/2009;
--------------------------	------------

(l) Collaborative Law Overview	3/27/2009;
--------------------------------	------------

2008-2009

(m) Training for Attorneys Appointed	8/1/2008;
--------------------------------------	-----------

2007-2008

(n) Charleston County Family Bar	11/16/2007;
----------------------------------	-------------

(o) SCDTAA Annual Meeting	11/1/2007;
---------------------------	------------

(p) Cool Tips – Family Court	8/2/2007;
------------------------------	-----------

(q) SC Circuit Court Arbitration Training	4/27/2007.
-------------------------------------------	------------

11. Have you taught law-related courses or lectured at bar association conferences, educational institutions, or continuing legal or judicial education programs? If so, briefly describe each course or lecture.

(a) I presented at the last two SC Bar Conventions during the Dispute Resolution Section program. My topic was collaborative law in the Family Courts;

(b) I have also guest lectured at the Charleston School of Law on the Department of Social Services abuse and neglect process and also on mediation. Please note these were guest lectures as part of a class for other instructors.

12. List all published books and articles you have written and give citations and the dates of publication for each.

Legal

(a) The Path to Alternative Dispute Resolution (Volume I – Issue I – Fall 2012 – Resolved – Journal of Alternative Dispute Resolution – Charleston School of Law) Author;

Non-Legal

(b) The Trust (Old Line Publishing – 2011) Author.

13. List all courts in which you have been admitted to practice and list the dates of your admission. Give the same information for administrative bodies that require a special admission to practice.

(a) Admitted to practice before the State Courts of SC in 1997;

(b) Admitted to practice before the Federal District Court and Fourth Circuit Court of Appeals in 1998.

14. Describe chronologically your legal experience since graduation from law school and include a list of all law firms with which you have been associated. Describe the general character of your practice and divide it into periods with dates if its character has changed over the years.

(a) 1997-2000 - The Mason Law Firm

The Mason Law Firm is a general practice firm. When I began my practice I handled the bulk of the firm's domestic practice. I was also involved in real estate work, criminal work, including juvenile justice, and some personal injury work.

During my first year in practice (1998) I was trained in Family Court mediation and added that as a component of my practice.

In the Family Courts I handled all aspects of cases preparing for numerous temporary hearings, defending and bringing Rules to Show Cause, and occasional trials. I also began to handle Department of Social Services cases during this time period;

(b) 2000-05 - Andrews & Shull

I accepted a job at Andrews & Shull, a firm with a focus on family law, in 2000. My mediation practice continued to grow and I also added private action Guardian *ad Litem* work during this time period. I phased out my general criminal practice, though occasionally continued to handle criminal matters in the Family Courts. During this period of employment, I was exposed to and involved in more complex family court litigation and was involved in the preparation for several trials and numerous contested temporary hearings. While I assisted two other attorneys with their cases, I continued to grow my practice initiating and having sole responsibility for cases of my own. It was during this time that I first began to conduct Family Court Arbitrations;

(c) 2006-10 - Sean F. Keefer, LLC

In 2006, I opened my own firm with a focus on domestic mediation and other forms of domestic alternate dispute resolution. In addition to this work, I continued to handle contested domestic matters though the number of trials in which I was involved decreased as I did not have the office resources to focus on this type of practice. During this time I also began to handle more Department of Social Services abuse and neglect cases as well as termination of parental rights cases. I continued my private Guardian *ad Litem* work and also began more

work as a Guardian *ad Litem* in Department of Social Services cases through appointments I received in this capacity;

(d) 2010-Present - Keefer & Keefer, LLC

In 2010, my wife and I transitioned my practice to include her. My work continued though I ceased work in Department of Social Services cases after accepting the position of Contract Attorney with the SC Guardian *ad Litem* Program, where I served as the Contract Attorney for Berkeley County.

I continued my mediation practice as well as my private Guardian *ad Litem* work and also continued to take the occasional contested family court case.

In 2012, I left the position Berkeley County GAL contract attorney position and have focused my practice on primarily domestic mediation and private Guardian *ad Litem* work, though I occasionally handle contested family court cases. I also assist clients in resolving their disputes via agreement and also conduct domestic arbitrations.

- 14.(a) If you are a candidate for Family Court, please provide a brief written description of your experience within each of the following Family Court practice areas: divorce and equitable division of property, child custody, adoption, abuse and neglect, and juvenile justice. Include information about cases you have handled in each of these practice areas, or if you have not practiced in an area, describe how your background has prepared you to preside over such matters as a Family Court Judge.

Divorce and equitable division of property.

Since my admission to practice this has been one of my primary areas of practice, handling cases involving these two issues on a regular basis. I have tried cases, prepared for and argued temporary hearings, filed and defended Rules to Show Cause and negotiated, both directly and via mediation, client agreements on the issues of equitable division.

The issue of equitable division is one of the more frequent areas in which I focus my efforts. Sometimes this issue is frequently present when I am assisting a client in resolving issues with a spouse via agreement. I have also dealt with the issue of equitable division in contested cases, though as of late I have been handling fewer such cases. When in contested cases the work on this issue will frequently require extensive discovery, valuation, asset identification and work in determining how the particular assets are to be allocated. Many times the issue is ultimately resolved in mediation where I represent clients, though in the past, trials have been necessary.

In my mediation practice I regularly deal with equitable distribution by regularly assisting parties divide and allocate assets and debts. Given some of the challenges facing our economy this has made some of the equitable division issues more novel and challenging in recent years.

As to the issue of divorce, the majority of the cases in which I have been involved, when it came time to ultimately have a divorce granted, the

divorce was generally granted on the grounds of one year separation; however, through my time in practice I have been involved in cases where the divorce was obtained, either for my client, or by the opposing party, on a fault based ground;

Child Custody.

The pattern of my work in child custody cases is very similar to the work on equitable division cases from the perspective of representing clients and the frequency of my work in this area. The issue frequently presents itself in the context to being an issue for agreements, as well this issue frequently presents itself in the context of the contested cases in which I am still involved. Additionally, in child custody cases I have been involved, and continue to remain involved, in a number of cases since 2000 as a private Guardian *ad Litem* where I have conducted numerous investigations related to all aspects of custody cases. This has involved contact with the parties, teachers, relatives, medical providers, educators, and the children for whom I have served. I have also traveled when necessary. This work has included working with the attorneys for the parties, briefing mediators, participation in mediations, preparing interim and final reports and presenting testimony at hearings and trials.

As well, child custody cases are perhaps the most common issue that present in mediations where I serve as a mediator. In this context I deal with this issue in unique cases on a weekly basis;

Adoption.

I have handled several adoptions for clients during my time in practice though my main work in adoptions has been as a Guardian *ad Litem* for the child or children whom are being adopted. As a part of this I have conducted investigations, conducted home visits, met with children, prepared reports and appeared at hearings to provide testimony;

Abuse and Neglect.

From the time I began practice, I handled Department of Social Services, (DSS), cases for both myself and for other attorneys in my and other firms. This included serving as counsel for named Defendants, serving as the Guardian *ad Litem* for subject children, and serving as counsel for others appointed as the Guardians *ad Litem*. In 2006, I began to accept DSS appointment referrals and as a result of this took on a number of DSS cases, serving in one of the above-referenced roles. During this time, I attended numerous merits hearings, permanence planning hearings, the occasional probable cause hearing and frequent DSS mediations. It was also common for me to participate in trials defending my clients or being involved as the Guardian or counsel for the Guardian on cases where a settlement had not been reached.

In 2010, I ceased to take any new DSS cases and went to work as the contract GAL attorney for Berkeley County where I appeared in court generally twice a week for hearings and also regularly represented volunteer Guardians in

contested merits, permanence and termination of parental rights trials. I also represented Guardians at numerous DSS mediations.

I have also conducted DSS mediations at the mediator.
Juvenile Justice.

During the first years of my practice I regularly represented juveniles in the family courts. None of these cases resulted in trials, all having been resolved by agreement. My recent practice in this area has been limited to perhaps two cases in the last several years where represented a juvenile and the matter was resolved via agreement. In another case I was appointed as the Guardian *ad Litem* for a minor child. Though I have not had extensive recent practice in this area, I feel I am sufficiently familiar with the process to allow me to preside over and conduct such proceedings.

15. What is your rating, if any, by any legal rating organization, such as, Best Lawyers, Chambers, Legal 500, Martindale-Hubbell, Who's Who Legal, Super Lawyers, etc.? If you are currently a member of the judiciary, list your last available rating, if any. BV – Martindale-Hubbell.
16. What was the frequency of your court appearances during the last five years?
 - (a) federal: 0%;
 - (b) state: 100%.
17. What percentage of your practice involved civil, criminal, domestic, and other matters during the last five years?
 - (a) civil: 0%;
 - (b) criminal: 0%;
 - (c) domestic: 90% (to include representation of clients and an ADR practice)
 - (d) other: 10% - primarily probate work involving the administration of estates and a small part general practice work.
18. What percentage of your practice in trial court during the last five years involved matters that went to a jury, including those that settled prior to trial?
 - (a) jury: 0%;
 - (b) non-jury: 100%.

Did you most often serve as sole counsel, chief counsel, or associate counsel in these matters? Sole Counsel.
19. List five of the most significant litigated matters you have personally handled in either trial or appellate court or before a state or federal agency. Give citations if the cases were reported and describe why these matters were significant.
 - (a) Abraham Wigfall v. Corenda Wigfall – 1999-DR-10-4833
In this matter I represented the Defendant and the case involved children's issues, equitable distribution, transmutation of property, spousal support and attorneys' fees as contested issues. It is significant as it was the first case that I handled from intake to trial completely on my own;
 - (b) Peter M. Evanciew v. Monica E. Goldberg – 2000-DR-10-5548
I represented the Plaintiff and assisted him in the filing of a Rule to Show Cause dealing with a number of alleged violations related to

parental communication, communication with the child, parental cooperation, coast to coast travel, travel reimbursement and attorneys' fees. This case was significant for me as it involved a very convoluted set of facts, several years worth of expense and travel records and a large number of transcripts from phone conversations, all of which had to be condensed and concisely presented to the Court in order to successfully prosecute my client's Rule to Show Cause. This was also one of the first Rules to Show Cause that I tried where the length of the trial was more than an hour, this trial going an entire day. While numerous attempts were made to resolve and settle the case the matter came to trial and was, ultimately, resolved in my client's favor;

- (c) Mark R. Edmondson v. Jeanine O. Edmondson – 2010-DR-10-2210

This involved a claim made by the Plaintiff against my client for the elimination or reduction of an amount of alimony that had been previously established via the parties' agreement. This case involved significant written discovery, a contested temporary hearing and extensive the trial preparation. Ultimately with the assistance of the Court, on the day of trial, the case settled. This matter was significant as it involved litigation of an issue that originated from an agreement some years before in which I had also served as counsel for my client. The issues were also interesting as the case involved the termination/reduction of alimony and the issue of voluntary underemployment that could have worked to my client's detriment though ultimately worked in my client's benefit. This case also underscored how proper preparation for trial can often serve as a very effective tool for settlement;

- (d) DSS v. Bryant, Doe, Lee and Washington – 2008-DR-08-880, 2008-DR-08-1730, and 2008-DR-08-1142.

I represented a Defendant Father, Washington, in a Termination of Parental Rights action brought by the Department of Social Services. My client was an elderly gentleman who had been involved with the Mother though they were never married. He presented in such a fashion that I felt it necessary to have a Guardian *ad Litem* appointed for him. The Father did not want to have his parental rights terminated. Ultimately the case was tried.

The case was significant in that at trial I was able to show that both the Mother, through overt actions, and the Department of Social Services, through minimal contact with my client, had done little to allow my client to participate in the action at the child protective services stage. This matter was perhaps most significant in that the Court denied the Department's request to terminate my client's parental rights;

- (e) DSS v. Miller, Sims, Scurry and Mayers – 2008-DR-08-1830 and 2008-DR-08-1656

This matter involved a contested permanence and treatment plan. While this case came into existence prior to my beginning to represent the Berkeley County volunteer Guardian *ad Litem* program all of the trial preparation and witness preparation was done by me.

This case was significant for me in that many times Guardians *ad Litem* testify in summary fashion as to interaction with children or conversations with parties, case workers, providers or the like. In this matter the Guardian *ad Litem* had, I believed, truly hoped the Mother would successfully complete a treatment plan and regain custody of her children. As a result of this the Guardian *ad Litem* challenged the Mother and held her accountable toward working towards the completion of her treatment plan (which had been previously ordered.) In doing this the Guardian *ad Litem* brought information and evidence that had to be presented through her that was beyond the normal testimony of a Guardian.

While the Department of Social Services had the burden of proof, I was able, through additional testimony, apart from what was offered by the Guardian *ad Litem*, provide evidence believe was critical for court's decision which was consistent with what the Guardian *ad Litem* had believed was best for the children.

- 20. List up to five civil appeals you have personally handled. N/A.
- 21. List up to five criminal appeals that you have personally handled. N/A.
- 22. Have you ever held judicial office? No.
- 24. Have you ever held public office other than judicial office?

I was a member of the City of Charleston Board of Zoning Appeals – Site Design. I was a member from 2003 through 2005 and resigned from the board. I was appointed by the Mayor of the City of Charleston. I am not aware of a filing requirement with the State Ethics Commission and did not file anything with the Commission.

I was also a member of a citizens committee of the City of Charleston selected by the Mayor of the City of Charleston to study and make recommendations regarding a potential smoking ban in the City. I served on this Committee, acting as the Chairman of the committee in 2004. I did not make any filing with the State Ethics Commission.

- 25. List all employment you had while serving as a judge (whether full-time or part-time, contractual or at will, consulting or otherwise) other than elected judicial office. N/A.
- 26. Have you ever been an unsuccessful candidate for elective, judicial, or other public office? N/A.
- 27. Have you ever been engaged in any occupation, business, or profession other than the practice of law, teaching of law, or holding judicial or other public office?

Prior to attending law school, I worked for Phi Delta Theta International Fraternity located at 2 South Campus Avenue, Oxford, Ohio 45056 – 513-

523-6345. This employment followed my time as a graduate student. I also worked for Circuit City immediately prior to law school as a salesman.

Following law school my only full time employment has been as an attorney. However, since the time I have been an attorney, I have received income as a musician, a photographer and as an author; however, none of this separate work was performed for another employer and has never risen to the level of more than occasional, part-time income/work.

28. Are you now an officer or director or involved in the management of any business enterprise?

None other than the law firm of Keefer & Keefer, LLC that is owned equally with my wife. It is through Keefer & Keefer, LLC that I practice law and perform ADR services. I have been in this position since 2010.

29. A complete, current financial net worth statement was provided to the Commission.

30. Describe any financial arrangements or business relationships you have, or have had in the past, that could constitute or result in a possible conflict of interest in the position you seek. Explain how you would resolve any potential conflict of interest.

I am unaware of any financial arrangement or business relationship that would cause any conflict in the position for which I am applying. I will note that I am the registered agent for 9 current and one former SC business entity. These are entities that I have assisted in forming during my career in law. Should a conflict arise in regard to any of these, I would disclose the conflict upon learning of it and based upon the then applicable facts make a decision as to whether I felt I could continue or if a recusal would be appropriate based on the totality of the circumstances and input from counsel.

31. Have you ever been arrested, charged, or held by federal, state, or other law enforcement authorities for violation or for suspicion of violation of any federal law or regulation, state law or regulation, or county or municipal law, regulation, or ordinance, or any other law, including another country's law?

No.

32. Have you, to your knowledge, ever been under federal, state, or local investigation for possible violation of a criminal statute? No.

33. Has a tax lien or other collection procedure ever been instituted against you by federal, state, or local authorities? Have you ever defaulted on a student loan? Have you ever filed for bankruptcy? No.

34. Have you ever been sued, either personally or professionally, that is, have you ever been named as defendant or respondent in any court of law? No.

36. Have you ever been investigated by the Department of Social Services? Has your name ever been enrolled on the Central Registry of Child Abuse and Neglect? No.

37. If you are in private practice, are you covered by malpractice insurance and, if so, how long have you carried malpractice insurance? If applicable, have

you ever been covered by a tail policy? If so, please explain when you were covered by a tail policy.

I am currently covered by malpractice insurance and have carried it personally since 2006 when I first began solo practice. Prior to 2006 I was covered under the policy of the firm with whom I was then employed.

My current policy has a \$1,000,000 limit of liability per claim. My deductible is \$5,000.00.

38. Are you now or have you ever been employed as a "lobbyist," as defined by S.C. Code § 2-17-10(13), or have you acted in the capacity of a "lobbyist's principal," as defined by S.C. Code § 2-17-10(14)? No.
39. Since filing with the Commission your letter of intent to run for judicial office, have you accepted lodging, transportation, entertainment, food, meals, beverages, money, or any other thing of value as defined by S.C. Code § 2-17-10(1) from a lobbyist or lobbyist's principal? No.
40. S.C. Code § 8-13-700 provides, in part, that "[n]o public official, public member, or public employee may knowingly use his official office, membership, or employment to obtain an economic interest for himself, a member of his immediate family, an individual with whom he is associated, or a business with which he is associated." None known.
41. S.C. Code § 8-13-765 provides, in part, that "[n]o person may use government personnel, equipment, materials, or an office building in an election campaign." None known.
42. Itemize (by amount, type, and date) all expenditures, other than those for travel and room and board, made by you, or on your behalf in furtherance of your candidacy for the position you seek.

To date, other than postage related to the letter of intent and for transmittal of this application, no expenditures have been made by me or on my behalf in furtherance of my candidacy for this position.

43. List the amount and recipient of all contributions made by you or on your behalf to members of the General Assembly since the announcement of your intent to seek election to a judgeship. None.
44. Have you directly or indirectly requested the pledge of any member of the General Assembly as to your election for the position for which you are being screened? Have you received the assurance of any public official or public employee that they will seek the pledge of any member of the General Assembly as to your election for the position for which you are being screened?

I have not requested the pledge of any member of the General Assembly. Since deciding to seek this position, to learn about the process, I have spoken to two members, George Hearn and Leon Stavrakis, concerning the application process.

45. Have you requested a friend or colleague to contact members of the General Assembly on your behalf? If so, give details. Are you aware of any friends or colleagues contacting members of the General Assembly on your behalf? No.

46. Have you or has anyone acting on your behalf solicited or collected funds to aid in the promotion of your candidacy? No.
47. Have you or has anyone acting on your behalf contacted members of the Judicial Merit Selection Commission about your candidacy or intention to become a candidate? No.
48. List all bar associations and professional organizations of which you are a member and give the titles and dates of any offices you have held in such groups.
- (a) SC Bar Association;
Member Ninth Circuit Resolution of Fee Dispute Board – 2007-09;
Member – SC Bar DR Council – 2009-Present;
Secretary – SC Bar DR Council – 2012-2013;
 - (b) Charleston County Bar Association.
49. List all civic, charitable, educational, social, and fraternal organizations of which you are or have been a member during the past five years and include any offices held in such a group, any professional honors, awards, or other forms of recognition received and not listed elsewhere.
- (a) Mediation and Meeting Center of Charleston
Board Member – 2008-Present
Board Treasurer – 2009-11
Vice-Chair – 2011-12;
 - (b) SC Collaborative Law Institute
Board Member – 2007-09;
Treasurer – 2008-09.
 - (c) Free and Accepted Masons – Oxford Lodge #67 – Oxford, Ohio
50. Provide any other information that may reflect positively or negatively on your candidacy, or which you believe should be disclosed in connection with consideration of you for nomination for the position you seek.

During my career I have had the privilege to appear before the Family Court many times. During this time I have seen judges faced with many, often difficult, decisions. While the job of a family court judge would likely never be described as easy, I believe that an effective family court judge is one who fairly and consistently applies the existing law to the case at hand.

My practice has been diverse and in addition to my Court appearances I have had a great deal of experience as a mediator, conducting hundreds of mediations. I have also served as an arbitrator. The totality of this experience created a personal philosophy that the decisions to be made in family court settings should be done with an even hand applying the law as it exists in SC. I do not believe that judges should be activists at the trial level, but should strive for the consistent application of existing law.

My experience as an attorney, mediator and as a Guardian *ad Litem* has also shown me that while a judge's docket may consist of hundreds of cases per month, each case is unique to the individual parties no matter how routine the individual issues may be. Accordingly, I believe that the totality of my

experience in my legal career has postured me to be able to consistently apply existing law to the case at hand while being keenly aware that to the litigants in the individual cases that case is unique and individually important to them.

51. References:

- (a) Shawn Barfield, Esquire
Ninth Judicial Circuit Solicitor's Office
101 Meeting Street
Charleston, SC 20401
843-958-1900
- (b) Mrs. Revonda Hardesty
Berkley Count Volunteer
Guardian *ad Litem* Program
111 Pine Street
Moncks Corner, SC 29461
843-719-4953
- (c) Elizabeth Stringer, Esquire
Stringer & Stringer
753 Folly Road
Charleston, SC 29412
843-795-1331
- (d) Dawes Cooke, Esquire
885 Island Park Drive
Charleston, SC 29492
(843) 577-7700

- (e) Ronata German-Turner
Bank of America
901 Savannah Highway
Charleston, SC 29407
843-720-4970
- (f) John T. Church, III
USAA Federal Savings Bank
10750 McDermott Freeway
San Antonio, TX 78288
800 531-8722

NOTE – Separate letters are provided from the Bank of America where my law firm has its operation and trust accounts and also from USAA Savings Bank where my personal accounts are located. The USAA letter, due to time constraints, is a faxed letter.

As part of my work to complete this application I received an additional reference letter that I have also included that I would ask the Commission to review should they so desire. The name and contact information of this individual is:

- (g) Alissa Collins, Esquire
Stuckey Law Offices
123 Meeting Street
Charleston, SC 29401
843-577-9323

YOUR SIGNATURE WILL BE HELD TO CONSTITUTE A WAIVER OF THE CONFIDENTIALITY OF ANY PROCEEDING BEFORE A GRIEVANCE COMMITTEE OR ANY INFORMATION CONCERNING YOUR CREDIT.

I HEREBY CERTIFY THAT MY ANSWERS ARE TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

Signature: Sean F. Keefer

Date: August 7, 2012